Highway 100/CSAH 3 Chlorinated Solvent Site

August 7, 2019

St. Louis Park and Edina Goals

- Protect human health and the environment
- Clear communications with residents
- Preserve confidence in safe drinking water

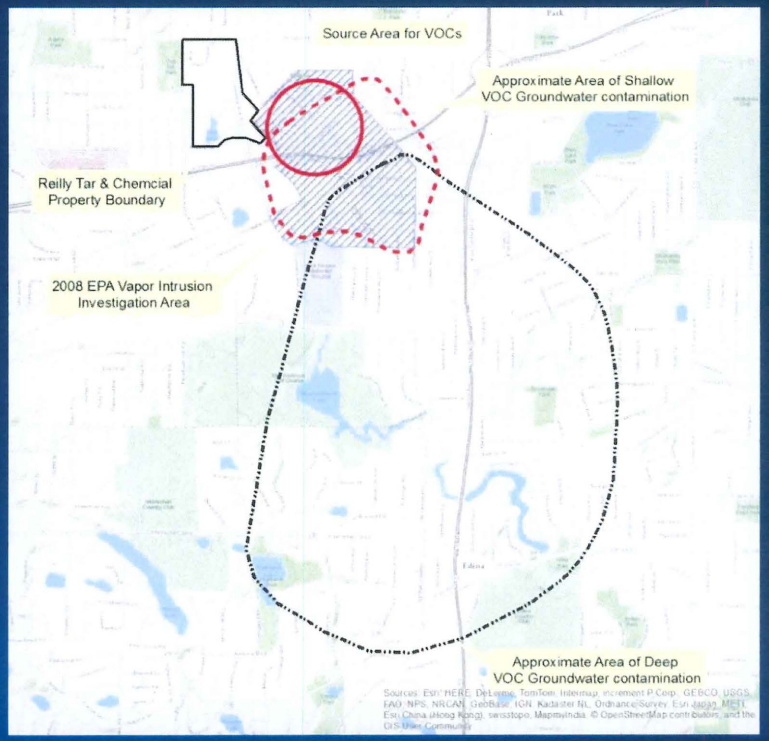
- Achieving these goals begins with the site description and the HRS scoring documentation

St. Louis Park and Edina Efforts to Date

- Immediately installed necessary water treatment systems.
  - Edina installed in 2012, $8.2 million plus $400K annual operating costs.
  - St. Louis Park installed in 2017, $3.5 million plus $40K increase in annual operating costs.
- Permanent, not an "interim measure"
- All communications and documentation should address safety of the drinking water supply.
  - Potential confusion when cities assure residents about drinking water quality while MPCA/EPA raise concerns about groundwater contamination.

Defining Site by Presumed Plume

- Encompasses ~2,000 acres, hundreds of residences, and $2 billion of property value
- Potential confusion of residents
  - "If my property and drinking water are perfectly safe, why was my home just included in a Superfund site?"



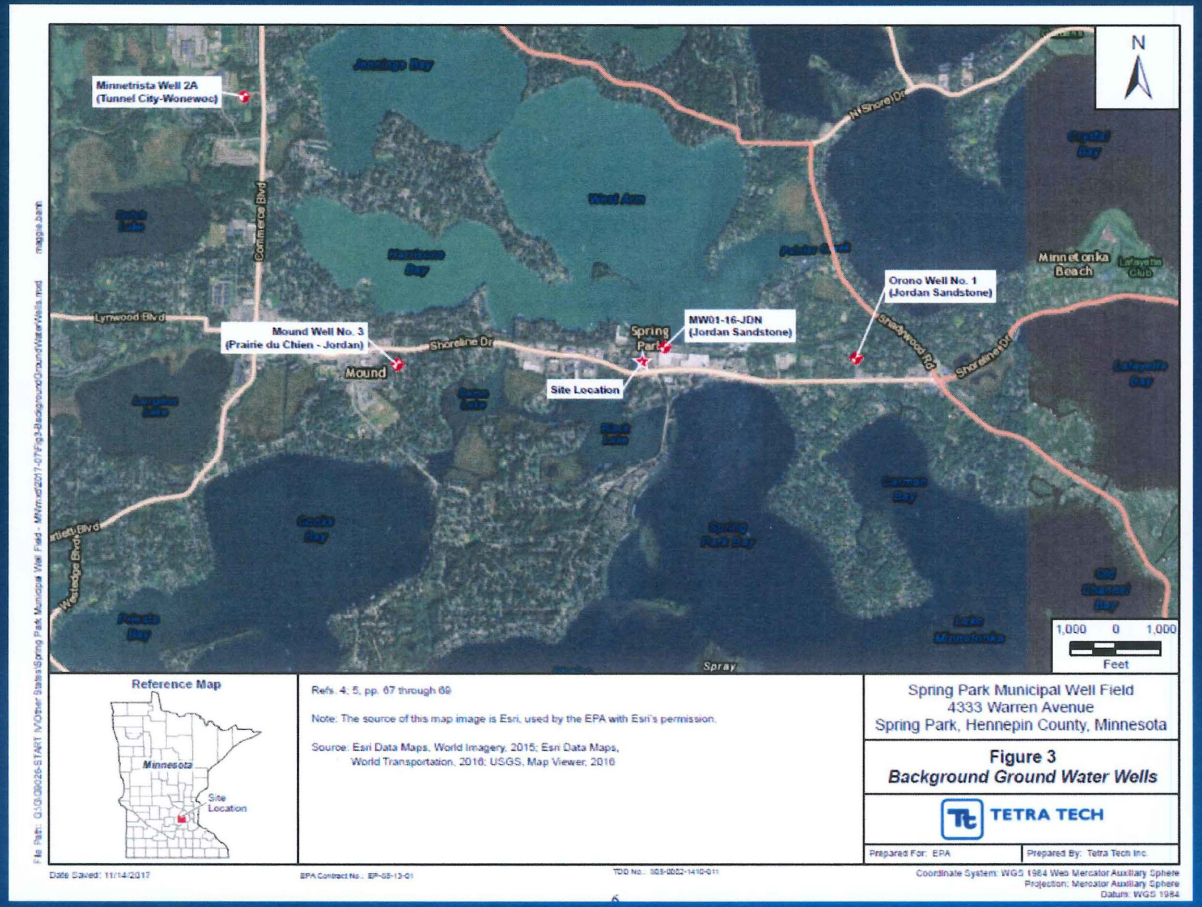
Defining Site by Source and Affected Wells

- Consistent with current understanding of the site.
  - Identified the "likely source area"
  - Know which municipal wells have been affected
  - Uncertainty regarding extent of groundwater contamination

Defining Site by Source and Affected Wells

- Consistent with HRS Documentation at similar sites
  - Spring Park (MN, 2018)
  - Hockessin (DE, 2018)
  - Five Points (UT, 2007)
  - Long Prairie (MN, 1986)

Spring Park (MN, 2018)



Hockessin (DE, 2018)

Five Points (UT, 2007)

The Five Points PCE Plume site is located in an area of mostly commercial and residential use on the border of the City of Woods Cross and the City of Bountiful (Refs. 3; 7, pp. 5-6). The northwest corner of the Five Points Mall was used as a point of location for the latitude and longitude. The Five Points PCE Plume site was previously known as the Bountiful Five Points PCE plume, but was renamed to reflect the impact of the plume on Woods Cross municipal wells (Ref. 8, p. 1). The vertical extent of the plume is unknown.

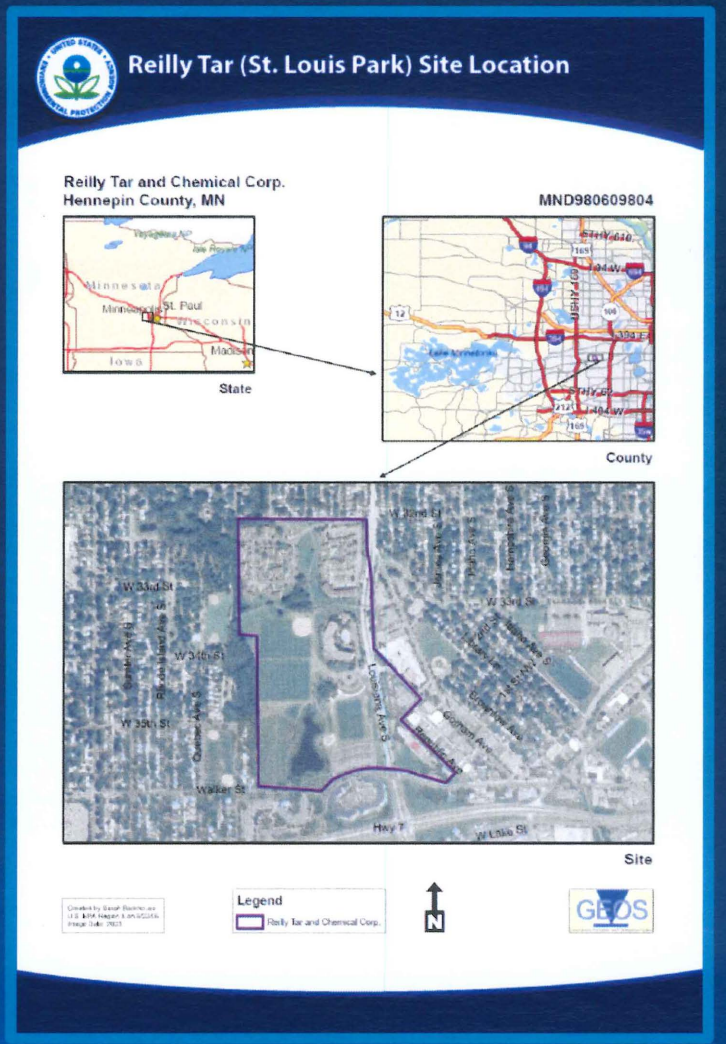
Long Prairie (MN, 1986)

Rationale for attributing the contaminants to the facility:

The source of contamination cannot be identified conclusively, therefore the site is defined as the contaminated wells mentioned in the references cited above * * * Ref 1, 2, 4

Defining Site by Source and Affected Wells

- Consistent with how residents understand the Reilly Tar Site
  - Property boundary is the "site boundary" where the near-surface contamination is located
  - Groundwater contamination extends southeast of the site



Defining Site by Source and Affected Wells

The site consists of a soil vapor plume, shallow groundwater plume, and deep groundwater plume. The likely source area for all three plumes is located northwest of the intersection of Highway 100 and County State Aid Highway (CSAH) 3 in St. Louis Park, MN. The soil vapor plume and shallow groundwater plume extend from the likely source area southeast toward the intersection of Hwy 100/CSAH3. Contamination from the deep groundwater plume has been detected in a municipal drinking water well in St. Louis Park (SLP 4) and three municipal drinking water wells further south in Edina (E2, E7, and E15). St. Louis Park well SLP4 is used as the site reference point.

Defining Site by Source and Affected Wells

- Does not change scoring for potential inclusion on the NPL
  - Scoring for groundwater plume is driven primarily by the number of residents served by wells with "actual contamination."
  - Presumed plume boundary would be material only where there is no likely source area identified and scoring is based on "potential contamination" of wells.
- Does not limit the ability to pursue additional PRPs which may be identified in the future.

Future Refinements of Boundaries

- Additional monitoring may provide necessary information to determine where the contaminants have come to be located within the deep aquifers. This data can be used to define the "facility" boundary.
- The facility should be defined and depicted in three-dimensions rather than a surface projection of the perimeter of the groundwater plume.
- Will avoid confusion by making clear that that the properties located above the plume are not included within the facility.